

Michael F. Buchanan, Esq. (NJ049041992)
PATTERSON BELKNAP WEBB & TYLER LLP
1133 Avenue of the Americas
New York, New York 10036
Tel: 212-336-2000

*Attorneys for Defendant
American Council of Learned Societies*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

----- X
JOSHUA KATZ, :
: Plaintiff, : **Civil Action No. 1:21 CV 04306**
: : **(AET)**
- v. - :
: AMERICAN COUNCIL OF LEARNED :
: SOCIETIES, :
: Defendant. :
: :
: :
: :
: :
----- X

**DECLARATION OF MICHAEL F. BUCHANAN IN SUPPORT OF
MOTION TO DISMISS OF AMERICAN COUNCIL OF LEARNED
SOCIETIES**

MICHAEL F. BUCHANAN pursuant to 28 U.S.C. § 1746, hereby
declares as follows:

1. I am a member in good standing of the bar of the State of New Jersey
and of the law firm of Patterson Belknap Webb & Tyler LLP, attorneys for

Defendant American Council of Learned Societies (“ACLS”). I submit this declaration in support of ACLS’s Motion to Dismiss.

2. Attached as Exhibit 1 is a true and correct copy of a February 19, 2020 letter sent by ACLS President Joy Connolly to Plaintiff Joshua Katz.
3. Attached as Exhibit 2 is a true and correct copy of a March 9, 2020 letter sent by Plaintiff Joshua Katz to ACLS President Joy Connolly.
4. Attached as Exhibit 3 is a true and correct copy of email correspondence on September 14, 2020 between ACLS President Joy Connolly and Plaintiff Joshua Katz.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 2, 2021

/s/ Michael F. Buchanan
Michael F. Buchanan

PATTERSON BELKNAP WEBB & TYLER LLP
1133 Avenue of the Americas
E-mail: mfbuchanan@pbwt.com
New York, NY 10036-6710
Telephone: (212) 336-2000
Fax: (212) 336-2222

CERTIFICATE OF SERVICE

I, Michael F. Buchanan, hereby certify, pursuant to 28 U.S.C. § 1746, that on April 2, 2021, I electronically filed the foregoing Declaration of Michael F. Buchanan in Support of Motion to Dismiss of American Council of Learned Societies with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all counsel of record.

Dated: April 2, 2021

By: */s/ Michael F. Buchanan*
Michael F. Buchanan (NJ 049041992)
PATTERSON BELKNAP WEBB & TYLER LLP
1133 Avenue of the Americas
New York, NY 10036-6710
Tel: (212) 336-2000
Fax: (212) 336-2222

*Attorneys for Defendant
American Council of Learned Societies*